

MEMO ENDORSED

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June 26, 2014

BY ECF

Honorable Ronnie Abrams
United States District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 1506
New York, N.Y. 10013

Re: U.S. Fengling Liu, 12 Cr. 000934 (RA)

Judge Abrams:

I was assigned by Your Honor to represent Fengling Liu in the above-referenced matter following her conviction by jury. At that time, Your Honor set a schedule for post-trial motions, with my motion on behalf of Fengling Liu being due on Monday, June 30, 2014. Sentencing is currently scheduled for July 25, 2014.

I am writing to request an extension of time in which to file my post-trial motions. As I had no involvement with the case before my assignment, which occurred only after the jury's verdict, I was not familiar with the charges, discovery, and trial evidence at that time. I had to obtain a copy of the trial transcript, which I have been reviewing, but because of commitments to other clients and cases, including a trial in state court that took more than half of May, I have not yet finished reading the transcript or reviewing the evidence.

I have spoken to Sean Maher, counsel for co-defendant Vanessa Bandrich, and Stanislaw German, counsel for co-defendant Rui Yang, and they join in my request for an extension of time in which to file post-trial motions. I also have spoken to AUSA Robert Boone, and he informed me that he does not object to this request. AUSA Boone, however, requested that his Response not be due during the month of August, as he will be on trial beginning on July 21, 2014.

The new proposed schedule for post-trial motions is as follows:

Defendants' motions due on or before August 15, 2014;

Government's Response due on September 12, 2014;

Defendants' Reply due on September 19, 2014.

The extension requested would also necessitate an adjournment of the sentencing date for the three trial defendants, which is now scheduled for July 25, 2014. The new proposed sentencing dates are:

Fengling Liu: October 17, 2014 at 3:00 p.m.

Rui Yang: October 10, 2014 at 10:00 a.m.

Vanessa Bandrich: October 17, 2014 at 11:00 a.m.

AUSA Boone has informed me that he has no objection to the above-proposed schedules.

This is Defendants' first request for such an extension.

Sincerely,

/s/ Arnold J. Levine

Arnold J. Levine (AL6819)

Attorney for Fengling Liu

6-27-14

Application granted. The schedule outlined above is approved. Rui Yang's sentencing submission shall be filed by September 26, 2014, and the Government's response shall be filed by October 3, 2014. Feng Ling Liu and Vanessa Bandrich's sentencing submissions shall be filed by October 3, 2014, and the Government's response shall be filed by October 10, 2014. So ordered.

A handwritten signature in blue ink, appearing to be 'Rui Yang', with a horizontal line underneath it.